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Counsel for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

PINEROS Y CAMPESINOS UNIDOS DEL)
NOROESTE, UNITED FARM WORKERS,)
FARMWORKER ASSOCIATION OF FLORIDA,)
CALIFORNIA RURAL LEGAL ASSISTANCE)
FOUNDATION, and PESTICIDE ACTION)
NETWORK NORTH AMERICA,)

Plaintiffs,)

v.)

E. SCOTT PRUITT, in his official capacity as)
Administrator of the U.S. Environmental Protection)
Agency; and U.S. ENVIRONMENTAL)
PROTECTION AGENCY,)

Defendants.)

Case No: 4:17-cv-03434 JSW

**DECLARATION OF PESTICIDE ACTION
NETWORK (PAN) IN SUPPORT OF
PLAINTIFFS' MOTION FOR
ATTORNEYS' FEES AND COSTS**

1 I, Kristin Schafer, hereby declare as follows:

2 1. I am the Executive Director at Pesticide Action Network (PAN), one of the plaintiff
3 organizations that brought the above-captioned case. I submit this declaration in support of
4 Plaintiffs' Motion for Attorneys' Fees and Costs, submitted herewith. I have personal knowledge of
5 the matters stated herein and, if called as a witness, could and would competently testify thereto.

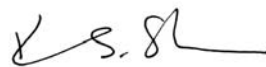
6 2. When this lawsuit was filed in June 2017, and as of the date of this declaration, PAN
7 was a 28 U.S.C. § 501(c)(3) tax-exempt organization, with approximately 16 employees. The same
8 was true when our Ninth Circuit petitions challenging the rule delays were filed in May and July
9 2017.

10 3. PAN retained Earthjustice to represent it in this litigation, because Earthjustice
11 attorneys have demonstrated skill and distinctive knowledge in the area of environmental and
12 administrative law.

13 4. I am familiar with Earthjustice and its attorneys and know that they have a reputation
14 for providing excellent representation in complex environmental and administrative law cases. In
15 my experience, no similarly qualified attorneys would have agreed to undertake this case at the
16 EAJA statutory rate of \$196.79, which is far below prevailing market rates for legal services in
17 California.

18 I declare under penalty of perjury that the foregoing is true and correct to the best of my
19 personal knowledge.

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22 Dated: __June 18, 2018__



23 Kristin S. Schafer, Executive Director
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